

**Sharkey, John**

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**Subject:** FW: Alan Lloyd's Comments on 1/23/07 draft for 1/26/07 meeting

-----Original Message-----

**From:** Erickson, Nathan

**Sent:** Wednesday, January 24, 2007 9:09 AM

**To:** Sharkey, John

**Cc:** Whitney, Rob; Neace, Thomas; Galloway, Chuck

**Subject:** Alan Lloyd's Comments on 1/23/07 draft for 1/26/07 meeting

-----Original Message-----

**From:** Heidie Torrealday [mailto:rockstars@atcnet.net]

**Sent:** Tuesday, January 23, 2007 9:18 PM

**To:** Erickson, Nathan

**Subject:** Re: The latest draft has been posted...

Nathan,

Line 221. Why can't a liner act to prevent caving or collapse of the formation? I suggest that a liner is "A telescopic string of casing, not extending to the surface." For example, one might install a 16" liner overlapping by at least 10 feet and extending into unconsolidated sediments in the bottom of a 20" hole. The liner serves the same function as casing, but doesn't extend to land surface inside the 20" casing. I think that liners installed downhole should be reinforced and belled out on top to reduce the annular gap and to prevent damage to the top of the liner.

Lines 243-248. I think that this density of grout is too viscous, too prone to fast curing due to the concentration of cement, and could form a great seal with twice the water content specified. You saw first hand what happened at Burley #7 with "no more than 6 gallons per 94 pound sack of cement." Rob Whitney once told me he thought this concentration was too thick. But it has remained in the regs for my entire drilling career. Why don't we come up with a more practical mix?

Because line 584-586 refers to pressure grouting, I think a definition at line 255 is appropriate to be included.

"Pressure Grouting..."

Line 423. I would like to see this table. Surrendering our judgement to NGWA is not a good idea. Just because it's NGWA, doesn't mean it makes any sense. I like the idea of a table which allows .250 wall for some larger diameters, up to limited depths. I think we need good, heavy casing and .250 is just fine for a lot of what we do. The idea of collapse strength assumes that the casing is unperforated, and being evacuated of water--please make this point to those pushing the "thicker is always better" line.

I really like the approach to seal language, the tables and all. Why, just out of curiosity, don't you want bentonite grout used above the water table? Is there some concern about desiccation and cracking? I like the across-the-board acceptance of bentonite chips and the option to pour under a variety of circumstances. I think that dry-pour bentonite chips, followed by hydration is the best seal possible in most cases.

Line 1049. Sonar Jet is an explosive product designed specifically to be detonated inside existing well casing to remove scale. You could call Bob Cushman 785-1588 for specific information on it. I understand you don't want dynamite or other high explosives used inside the well casing, for obvious reasons--we only use it to straighten problem areas in open holes in Basalt, but there are products out there that would be in direct contradiction to this section of the rule as written.

Thanks,

Alan

----- Original Message -----

**From:** Erickson, Nathan

**To:** Alan Lloyd (E-mail) ; Dale Pippitt (E-mail) ; Fred Walker (E-mail) ; Gary Funderburg (E-mail) ; Guy Weech (E-mail) ; Winston Inouye (E-mail)

**Sent:** Tuesday, January 23, 2007 10:59 AM

**Subject:** The latest draft has been posted...